U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Cleveland Trencher - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #2**
Cleveland Trencher

Euclid, OH
Latitude: 41.5789440 Longitude: -81.5372930

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Date: 9/27/2011
Reporting Period: 09/3/2011 through 09/23/2011

1. Introduction

1.1 Background

Site Number:	B5SJ	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	CERCLA	**Response Type:**	PRP Oversight
Response Lead:	PRP	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/22/2011	**Start Date:**	8/22/2011
Demob Date:		**Completion Date:**	
CERCLIS ID:	OHN 000 510 393	**RCRIS ID:**	
ERNS No.:		**State Notification:**	
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Potentially Responsible Party (PRP) lead Removal Action

1.1.2 Site Description

The CT Site encompasses approximately 14.5 acres of land and has approximately 140,000 square feet of buildings. Approximately 70,000 square feet of buildings have been demolished.

The Site is located in an industrial neighborhood. The Site is bordered to the north by St Clair Avenue and railroad tracks. Other industrial properties surround the Site on all sides.

1.1.2.1 Location

The CT Site is located at 20100 St Clair Avenue, Euclid, Cuyahoga County, Ohio 44117 and the geographical coordinates for the Site are: latitude 41^0 34' 44" North and longitude 81^0 32' 10" West.

1.1.2.2 Description of Threat

The Cleveland Division of Air Quality (CDAQ) stopped the property owner's from demolishing the site due to improper asebstos abatement. Friable asbestos is present in debris piles located throughout the site as well as inside the partially demolished building. In addition, over 120 drums of unknon materials, several tanks and transformers are present on the site. The property is fenced; however gaps in the fence allow unimpeded access to the site.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

OEPA performed a site assessment at the site in March, 2009. Samples from the site assessment indicated the presence of D001 hazardous wastes (characteristic of ignitability [flashpoint less than 140 degrees Fahrenheit]), D008 (characteristic of Toxicity [lead TCLP values greater than 5 milligrams per liter]), presence of polychlorinated biphenyls in electrical transformers, the presence of uncontrolled ACM was documented by the CDAQ, and many of the drums were open or leaking.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The PRPs contractors consildated all the asecestos contaminated debris and transported the debris off-site to a CERCLA approved landfill (Minerva, Minerva, Ohio) for disposal. The PRPs contractors also subcontracted with another company in order to perform the hazardous waste work associated with the removal of the drums and material inside tanks. Representatives from US EPA, Ohio EPA, Ohio Department of Health, PRP attorneys, and the Trustees were periodically on site to observe site progress.

2.1.2 Response Actions to Date

September 5, 2011 (Monday)

- Labor Day = No work conducted on site.

□

Σεπτεμβερ 6, 2011 (Τυεσδαψ)

- PRP contractor work activities included;
  - Continued consolidating asbestos contaminated debris piles outside the building for subsequent loading for transportation and disposal.
  - Began loading asbestos contaminated debris for transportation and disposal. Two (2) truck loads of asbestos waste transported off site for disposal today.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

□

Σεπτεμβερ 7, 2011 (Ωεδνεσδαψ)

- PRP contractor work activities included;
  - Continued loading asbestos contaminated debris for transportation and disposal. Six (6) truck loads of asbestos waste transported off site for disposal today.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.
- □

Σεπτεμβερ 8, 2011 (Τηυρσδαψ)

- PRP contractor work activities included;
  - Continued loading asbestos contaminated debris for

transportation and disposal. Twelve (12) truck loads of asbestos waste transported off site for disposal today.
    - Enviro-Serve on site today to characterize drums and containers.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities. Also conducted real-time air monitoring during the assessment of the drums and containers.

□

Σεπτεμβερ 9, 2011 (Φριδαψ)

- PRP contractor work activities included;
    - Continued loading asbestos contaminated debris for transportation and disposal. Ten (10) truck loads of asbestos waste transported off site for disposal today.
    - Enviro-Serve on site today to characterize drums and containers.
- PRP air monitoring firm continued the collection of background air samples for asbestos.

□

September 12, 2011 (Monday)

- PRP contractor work activities included;
    - Continued loading asbestos contaminated debris for transportation and disposal. Six (6) truck loads of asbestos waste transported off site for disposal today.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

□

Σεπτεμβερ 13, 2011 (Τυεσδαψ)

- PRP contractor work activities included;
    - Continued loading asbestos contaminated debris for transportation and disposal. Four (4) truck loads of asbestos waste transported off site for disposal today.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

□

Σεπτεμβερ 14, 2011 (Ωεδνεσδαψ)

- PRP contractor work activities included;
    - Continued loading asbestos contaminated debris for transportation and disposal.
    - Begin the removal of surface residual paint from the concrete floor within the footprint of the former Paint Booth building
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.
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□

Σεπτεμβερ 15, 2011 (Τηυρσδαψ)

- PRP contractor work activities included;

- Continued loading asbestos contaminated debris for transportation and disposal. Six (6) truck loads of asbestos waste transported off site for disposal today.
- Continued the removal of surface residual paint from the concrete floor within the footprint of the former Paint Booth building
- Began the removal of ACM pipe insulation inside the building.

• PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

□

Σεπτεμβερ 16, 2011 (Φριδαψ)

- PRP contractor work activities included;
  - Continued loading asbestos contaminated debris for transportation and disposal. Six (6) truck loads of asbestos waste transported off site for disposal today.
  - Completed the removal of ACM pipe insulation inside the building.
  - Enviro-Serve on site today to collect samples for characterization of the drum and container waste.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

September 19, 2011 (Monday)

- PRP contractor work activities included;
  - Continued loading asbestos contaminated debris for transportation and disposal. Three (3) truck loads of asbestos waste transported off site for disposal today.
  - Continued the removal of surface residual paint from the concrete floor within the footprint of the former Paint Booth building.
  - PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

□

Σεπτεμβερ 20, 2011 (Τυεσδαψ)

- PRP contractor work activities included;
  - Continued loading asbestos contaminated debris for transportation and disposal. Six (6) truck loads of asbestos waste transported off site for disposal today.
  - Removed the 4 transformers from their original location and relocated to the Container Area #1.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

□

Σεπτεμβερ 21, 2011 (Ωεδνεσδαψ)

- PRP contractor work activities included;
  - Continued loading asbestos contaminated debris for transportation and disposal. Three (3) truck loads of asbestos waste

transported off site for disposal today.
  - Gathered equipment for the removal of residual asbestos spray-on material in the Machine Shop.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.
- Representatives from US EPA, Ohio EPA, START, Precision and EnviroServe on Site to discuss the characterization and consolidation of the drum and container waste.

□

Σεπτεμβερ 22, 2011 (Τηυρσδαψ)

- PRP contractor work activities included;
  - Two (2) truck loads of asbestos waste transported off site for disposal today. No asbestos debris loading activities today.
  - Completed the removal of surface residual paint from the concrete floor within the footprint of the former Paint Booth building. Final inspection pending.
  - Began the removal of residual asbestos spray-on material in the Maintenance Department.
  - EnviroServe on site to collect additional composite samples. Also delivered over-pack drums for subsequent consolidation activity.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

□

Σεπτεμβερ 23, 2011 (Φριδαψ)

- PRP contractor work activities included;
  - Continued loading asbestos contaminated debris for transportation and disposal. One (1) truck load of asbestos waste transported off site for disposal today.
  - Completed the removal of surface residual paint from the concrete floor within the footprint of the former Paint Booth building.
  - EnviroServe on Site to remove oil from the 4 transformers, and transport oil off site for disposal/recycling. Precision transported the 4 transformers off site for scrap.
  - Continue to remove loose/hanging building materials from partially demolished buildings.
  - Completed the removal of residual asbestos spray-on material in the Maintenance Department. Upon completing the decontamination activity, Precision demolished the Maintenance Department building.
- PRP air monitoring firm continued the collection of perimeter and personnel air samples for asbestos removal activities.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The Cleveland Trencher Site was referred to U.S. EPA in May, 2009. U.S. EPA identified

the two potentially responsible parties (one for the asbestos portion of cleanup, one for the cleanup of drums and other containers)and issued General Notice Letters as well as a Unilateral Action Order. Agreements were reached and the PRPs mobilized their contractors on August 22, 2011 to begin removal actions.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*

2.2 Planning Section

2.2.1 Anticipated Activities

Transport and dispose of all waste at the site (asbestos, drums)
inspect tanks for material and render unusable
remove transformers from site
Clean pad used for drum storage and footprint where ACM debris was located

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

2.2.2 Issues

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

US EPA contactor is tracking costs seperately (asbestos oversight and drum oversight) in order to properly allocate the costs associated with the activities to the correst PRP. Costs referenced in the following table are summarized for the entire project

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	$50,000.00	$26,000.00	$24,000.00	48.00%
Intramural Costs				
USEPA - Direct	$25,000.00	$5,000.00	$20,000.00	80.00%
Total Site Costs	$75,000.00	$31,000.00	$44,000.00	58.67%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Safety Officer

Daily safety meetings are held prior to the start of the work day.

Personnel air sampling for asbestos is being conducted

Wet techniques are being used for asbestos removal

The START oversight personnel is asbestos certified

2.6 Liaison Officer

2.7 Information Officer

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

4. Personnel On Site

PRP contractors
START (1)

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

6.2 Reporting Schedule

7. Situational Reference Materials